

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

DAWN BLANGO : **VIOLATION:**

: **18 U.S.C. § 1344 (bank fraud - 1 count)**

: **18 U.S.C. § 1028A(a)(1), (c)(5)**

: **(aggravated identity theft - 2 counts)**

: **18 U.S.C. § 2 (aiding and abetting)**

: **Notice of forfeiture**

COUNT ONE

At all times material to this indictment:

1. From in or about October 2005 through in or about February 2007, defendant DAWN BLANGO worked as a roving bank teller at Wachovia Bank branches in Montgomery County and Philadelphia County, Pennsylvania.
2. In the course of her employment at Wachovia Bank, defendant DAWN BLANGO had access to customers' confidential bank account information, including account holders' names, addresses, account numbers, and signature cards.
3. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 33869.

4. From in or about October 2006, through in or about February 2007, in the Eastern District of Pennsylvania, and elsewhere, defendant

DAWN BLANGO

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Wachovia Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

5. Defendant DAWN BLANGO stole confidential Wachovia Bank customer account information and provided that information to others unknown to the Grand Jury who created and cashed fraudulent checks and made fraudulent withdrawals from the compromised accounts.

6. From in or about October 2006 through in or about February 2007, defendant DAWN BLANGO accessed confidential Wachovia Bank customer account information, including account holders' names, addresses, account numbers, and signature cards. While accessing this confidential customer account information, defendant BLANGO printed the signature cards and verified the names and account numbers for approximately 14 accounts.

7. Defendant DAWN BLANGO then provided the confidential Wachovia Bank customer account information for the approximately 14 accounts, including copies of signature cards, to others unknown to the Grand Jury for fraudulent use. Defendant BLANGO was paid approximately \$100 for each of the signature cards she provided.

8. From in or about December 2006 through in or about February 2007, after defendant DAWN BLANGO compromised Wachovia Bank customer account information, money was stolen from the bank through fraudulent checks purportedly made out to the holders

of the compromised accounts, and fraudulent withdrawals from the compromised accounts. Each of the fraudulent checks and withdrawal slips contained forged signatures.

9. Through the above methods, the person or persons to whom defendant DAWN BLANGO provided the confidential Wachovia Bank account information stole a total of approximately \$74,898.56 from Wachovia Bank.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2006, in the Eastern District of Pennsylvania, defendant

DAWN BLANGO

knowingly and without lawful authority transferred and possessed a means of identification of another person, that is, the name M.S.C. and the Wachovia Bank account number ending in the last four digits 3795, during and in relation to a bank fraud.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2006, in the Eastern District of Pennsylvania,
defendant

DAWN BLANGO

knowingly and without lawful authority transferred and possessed a means of identification of another person, that is, the name C.S.B. and the Wachovia Bank account number ending in the last four digits 4832, during and in relation to a bank fraud.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1344, set forth in this indictment, defendant

DAWN BLANGO

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offense, including, but not limited to, the sum of \$74,898.56.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant's up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY